



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

April 8, 2020

BY ECF AND ELECTRONIC MAIL

The Honorable William H. Pauley III
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Amilcar Romero et al.*, 19 Cr. 734 (WHP)

Dear Judge Pauley:

The Government respectfully writes with the consent of defense counsel on behalf of the parties to request that the next conference in this matter, currently scheduled for April 15, 2020, at 2:30 p.m., be adjourned until the end of June 2020.

Such an adjournment seems appropriate in light of the difficulties that the COVID-19 pandemic currently presents. If the Court grants the parties' application to adjourn, the Government moves to exclude time under the Speedy Trial Act, pursuant to Title 18, United States Code, Section 3161(h)(1)(A), until the date of the next conference. The Government submits that the ends of justice served by such an exclusion outweigh the best interests of the defendants and the public in a speedy trial, because such an exclusion will allow the defendants and their counsel time to continue reviewing the voluminous discovery in this case, evaluating whether any motions are appropriate, and discussing with the Government potential pretrial resolutions of this matter. In addition, such an exclusion will also ensure the effective assistance of counsel and prevent any miscarriage of justice. Defense counsel consent to this motion.

Application granted. The conference is adjourned to June 25, 2020 at 2:00 p.m. Time excluded in the interest of justice until June 25, 2020. The parties are to confer and submit a proposed motion schedule by April 24, 2020.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

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SO ORDERED:


WILLIAM H. PAULEY III
U.S.D.J.

April 9, 2020